

AO 91 (Rev. 11/11) Criminal Complaint

United States Courts  
Southern District of Texas

## UNITED STATES DISTRICT COURT

FILED

February 28, 2020

for the

Southern District of Texas

David J. Bradley, Clerk of Court

United States of America

v.

Elaine Lewis Davis

Case No.

3:20-MJ-52

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 27, 2020 in the county of Galveston in the  
Southern District of Texas, the defendant(s) violated:

Code Section

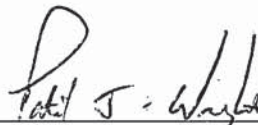
Offense Description

18 USC § 1501

Assault on process server

This criminal complaint is based on these facts:

See attached affidavit.

☐ Continued on the attached sheet.

Complainant's signature

Patrick J. Wright, Special Agent - FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: 2-28-20City and state: Galveston, Tx

Judge's signature

Andrew Edison - U.S. Magistrate Judge

Printed name and title

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
GALVESTON DIVISION

IN THE MATTER OF THE CRIMINAL  
COMPLAINT AGAINST ELAINE  
LEWIS DAVIS

Case No. 3:20-MJ-52

**AFFIDAVIT OF PROBABLE CAUSE**

I, Special Agent Patrick J. Wright, being first duly sworn, hereby depose and state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) currently assigned to the Houston Division Texas City Residence Agency (TCRA) investigating international terrorism and criminal violations. I have been a Special Agent with the FBI since March 2008. While in the FBI, I have been assigned to the Memphis Division/Nashville RA and the Houston Division/Texas City RA. Prior to the FBI, I was an Investigative Specialist with the FBI for approximately 6 years.

2. This Affidavit is submitted in support of a criminal complaint charging Elaine Lewis Davis, with obstruction of justice—assault on process server, in violation of Title 18, United States Code, Section 1501.

3. This Affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included each and every fact known to me concerning this investigation, I have set forth only those facts I believe are necessary to establish probable cause that evidence of violation of Title 18, United States Code, Section 1501, the obstruction of justice—assault on a process server, on or about February 27, 2020, and was

committed by Elaine Lewis Davis (E. DAVIS). Throughout this Affidavit, statements made by sources of information and other witnesses are set forth in substance and in pertinent part unless otherwise indicated. Further, the facts and circumstances of this investigation have not been set forth in pertinent part for the purpose of this Affidavit and do not include the complete factual history of this investigation, or all of its details.

**Factual Basis to Support Criminal Complaint**

4. On or about February 27, 2020, Special Agents and Task Force Officers with the Federal Bureau of Investigation, an Investigator with the Galveston County District Attorney's Office, and League City Police Department Detectives, were lawfully attempting to effect the arrest of AMARI SINGH (SINGH) at 1521 Toluca Drive, League City, Texas, in the Southern District of Texas. SINGH is the subject of a Federal Arrest Warrant signed out of the Southern District of Texas.

5. League City Police Department Detectives surveilled the residence and observed SINGH present at 1521 Toluca Drive, League City, Texas.

6. FBI Special Agent Patrick York and DA Investigator David Simon approached the residence and made contact with SINGH's grandmother, E. DAVIS. Special Agent York identified himself as an Agent of the FBI by verbally telling and presenting his credentials to E. DAVIS, and subsequently presented the arrest warrant for SINGH. Special Agent York asked to speak with SINGH, to which E. DAVIS replied that SINGH was not at the residence.



7. Special Agent York told E. DAVIS that SINGH had been observed coming in and out of the Toluca residence this morning. E. DAVIS continued to repeatedly denied SINGH's presence at the residence.

8. SINGH's uncle, CHAD EARL DAVIS (C. DAVIS) approached the door and was immediately aggressive and uncooperative. C. DAVIS also stated that SINGH was not present at the residence.

9. SINGH subsequently came downstairs to the front door of the residence in an aggressive manner. Once Special Agent York and DA Investigator Simon observed SINGH, Special Agent York entered the residence seizing SINGH by his wrist in an attempted to apprehend SINGH pursuant to the arrest warrant. SINGH resisted arrest by pulling away and running toward the downstairs family room area of the residence. As Special Agent York was attempting to arrest SINGH, both Special Agent York and SINGH fell to the ground.

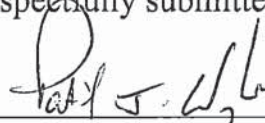
10. Supervisory Senior Resident Agent (SSRA) Richard Rennison and other law enforcement arrived at the residence as Special Agent York and SINGH were struggling. C. DAVIS then got on top of Special Agent York's back and placed his arm around Special Agent York's neck from behind in a chokehold fashion. C. DAVIS released his chokehold on Special Agent York only upon other agents and officers entering the residence and physically removing him from Special Agent York's back.

11. After E. DAVIS was read and stated she understood her Miranda Warnings, she agreed to an interview with Special Agent York. E. DAVIS admitted to lying to law enforcement regarding her knowledge of SINGH's whereabouts.

**CONCLUSION**

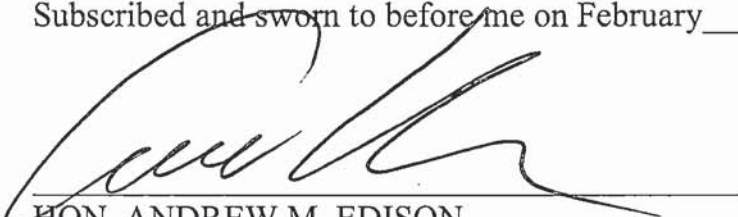
12. Based on the forgoing, I respectfully submit that there is probable cause that ELAINE LEWIS DAVIS has violated Title 18, United States Code, Section 1501.

Respectfully submitted,



Patrick J. Wright  
Special Agent, FBI

Subscribed and sworn to before me on February 28, 2020



HON. ANDREW M. EDISON  
UNITED STATES MAGISTRATE JUDGE